



GLOBAL TELECOM & TECHNOLOGY

February 29, 2008

Via Electronic Comment Filing System

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, D.C. 20554

**Re: Annual Compliance Certification of Global Telecom &
Technology Americas, Inc. Pursuant to 47 C.F.R. §
64.2009(e)**

Dear Ms. Dortch:

Enclosed please find the above-referenced certification for filing with the Federal Communications Commission.

If you have any questions regarding the attached, please contact me at (703) 442-5500.

Sincerely yours,



Michael Avis

Enclosure

cc: Enforcement Bureau Telecommunications Consumers Division (2 copies)
Best Copy and Printing, Inc. (via e-mail)



GLOBAL TELECOM & TECHNOLOGY

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 29, 2008

Name of company covered by this certification: Global Telecom & Technology Americas, Inc.

Form 499 Filer ID: 820586

Name of signatory: Richard D. Calder, Jr.

Title of signatory: President & Chief Executive Officer

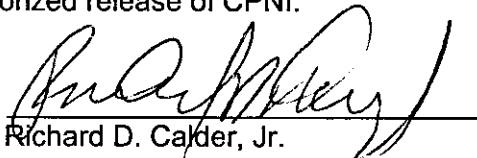
I, Richard D. Calder, Jr., certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed


Richard D. Calder, Jr.

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**STATEMENT OF GLOBAL TELECOM & TECHNOLOGY AMERICAS, INC.
REGARDING COMPLIANCE WITH FEDERAL REQUIREMENTS
GOVERNING USE AND PROTECTION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**

Global Telecom & Technology Americas, Inc. ("GTT") provides dedicated transport data networking services to wholesale customers and global, national, and regional enterprises. As a reseller of services offered on other carriers' networks, GTT is quite sensitive to, and has strong incentives to prevent, the unauthorized or otherwise impermissible use of confidential information relating to its customers and their service requirements. GTT has implemented a number of operating processes and procedures to protect sensitive customer information and to help ensure that CPNI is used and maintained consistent with the rules of the Federal Communications Commission (the "Commission").

All employees of GTT are required as a general matter (in both their employment agreements and in the company's code of conduct) to maintain the confidentiality of all information they obtain in connection with their employment, including customer-related information, and to use such information only to provide services to the customer or to comply with applicable law. Moreover, GTT has implemented and delivered to all employees a CPNI protection policy that explains, among other things what constitutes CPNI, what requirements apply to use and/or disclosure of CPNI, what type of authentication is required to validate inbound requests for CPNI, and what kinds of record-keeping and reporting obligations apply to CPNI. The policy is also provided to new hires as part of their orientation materials. GTT's CPNI policy and its code of conduct expressly specify that those employees who fail to abide by the applicable policies are subject to disciplinary action. In addition, GTT has instructed those employees that have access to CPNI for various business purposes with respect to the proper use and maintenance of confidential information. GTT also requires the execution of nondisclosure agreements with both suppliers and customers to ensure adequate protections for confidential information.

Consistent with the Commission's rules, GTT may use, disclose, and/or permit access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of GTT, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

GTT does not presently use CPNI in marketing campaigns. However, because it may do so in the future, GTT has adopted a policy to transmit regular notices to all customers regarding their right to restrict use of, disclosure of, and access to CPNI. The notice informs customers of what types of information would be considered CPNI and identifies each customer's right, and GTT's obligation, to protect the confidentiality of CPNI. In the notice, GTT states that it may use CPNI to make customers aware of additional product offerings and also to share information regarding purchases of communications-related services internally for purposes of informing the customer of similar service offerings by corporate affiliates. The notice specifies the means by which a customer can choose to "opt out" of such use of its CPNI, explains that the customer may choose to do so at any time after receipt of the notice, and indicates that any approval or denial of approval for use of CPNI would be valid for up to two years or until the customer affirmatively revoked or limited such approval or denial. Any customer response to these notices is directed to the GTT finance department, which maintains such notices for a minimum of two years.

Although GTT does not presently use CPNI in marketing campaigns, it plans to implement a system by which the status of a customer's CPNI approval with respect to use of CPNI in marketing campaigns can be established prior to such use or disclosure. Such a system would be operational prior to use of CPNI in any marketing campaigns.

GTT does not share, sell, lease, or otherwise provide any CPNI with or to any unaffiliated third parties for marketing purposes, and would not do so absent affirmative consent from the affected customer(s). Any outbound requests for approval from customers with respect to use of CPNI in such marketing campaigns would be reviewed in advance by appropriate supervisory personnel. GTT's policy is that records relating to such marketing campaigns that use CPNI would be maintained for at least one year.

GTT has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Only certain organizations within the company are authorized to discuss or provide CPNI to a customer in the context of providing services to that customer (e.g., to take an order, resolve a billing question, or resolve a service trouble report). In turn, those organizations that are authorized to discuss CPNI with or provide CPNI to a customer are required to engage in proper authentication of inbound requests for communication of CPNI. GTT provides only dedicated transport services, and therefore offers no services that generate detail information subject to more stringent authentication requirements under the Commission's rules. Still, all employees have been instructed to ensure reasonable authentication of inbound communications by reference to specific detailed information about the account or the particular services at issue. In addition, with respect to any online access that customers may have to CPNI, each customer is only able to view select information about their own account, and GTT employs password protection measures (and backup/reset processes) that do not rely upon readily available biographical information or account information. Finally, where any changes are requested or created by a customer with respect to account information such as address of record or online password access, GTT sends notification of such changes to the prior contact of record.

Through its policy and instruction, GTT has communicated to its employees the importance of providing prompt notification of any breaches with respect to the security of CPNI and the time frames for such required by the Commission's rules. Specifically, GTT has provided all employees with contact information to help ensure that appropriate managers within GTT receive rapid notification of any potential breaches. In turn, such managers have been informed of their reporting and record-keeping obligations under the Commission's CPNI rules with respect to any breaches thereof, including reporting such occurrences to law enforcement and later to customers if law enforcement approves. GTT will also maintain records relating to such breaches for a minimum of two years.